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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE TESLA, INC. SECURITIES
LITIGATION

Case No. 3:18-cv-04865-EMC

**PLAINTIFF’S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL**

Pursuant to Civil L.R. 7-11 and 79-5, Lead Plaintiff Glen Littleton (“Plaintiff”) brings this administrative motion to file under seal and/or redacted versions of (1) Plaintiff’s Motion for Partial Summary Judgment; and (2) the exhibits attached to Plaintiff’s Motion for Partial Summary Judgment.

This motion is necessitated by the Stipulated Protective Order dated May 20, 2020 (ECF No. 255), which provides that a party seeking to file “Protected Material” with the Court must do so under seal pursuant to Civil L.R. 79-5. *See* Stipulated Protective Order at ¶12.3. Notwithstanding the foregoing, Plaintiff has objected to Defendants’ designation of the “Protected Material” as “Confidential” and/or “Highly Confidential – Attorneys’ Eyes Only” on the basis that it does not deserve confidential treatment. *See Circle Click Media LLC v. Regus Mgmt. Grp. LLC*, No. 12-cv-04000-EMC, 2016 U.S. Dist. LEXIS 32665, at *4 (N.D. Cal. Mar. 14, 2016) (denying motion to seal where motions were “dispositive”). Therefore, Plaintiff’s present Administrative Motion is made for the sole purpose of complying with the Stipulated Protective Order’s directives concerning the filing of “Protected Material.”

The materials to be sealed and/or redacted pursuant to this Administrative Motion are as follows:

Document	Portions to be Filed Under Seal	Party Claiming Confidentiality	Basis for Sealing
Exhibit 44	Entirety	Defendants	Stipulated Protective Order, ¶12.3
Exhibit 45	Entirety	Defendants	Stipulated Protective Order, ¶12.3
Exhibit 46	Entirety	Defendants	Stipulated Protective Order, ¶12.3
Exhibit 47	Entirety	Defendants	Stipulated Protective Order, ¶12.3
Exhibit 58	Entirety	Defendants	Stipulated Protective Order, ¶12.3
Exhibit 79	Entirety	Defendants	Stipulated Protective Order, ¶12.3
Exhibit 81	Entirety	Defendants	Stipulated Protective Order, ¶12.3
Exhibit 82	Entirety	Defendants	Stipulated Protective Order, ¶12.3
Exhibit 83	Entirety	Defendants	Stipulated Protective Order, ¶12.3
Exhibit 90	Entirety	Defendants	Stipulated Protective Order, ¶12.3
Exhibit 91	Entirety	Defendants	Stipulated Protective Order, ¶12.3
Exhibit 101	Entirety	Defendants	Stipulated Protective Order, ¶12.3
Exhibit 113	Entirety	Defendants	Stipulated Protective Order, ¶12.3

Exhibit 114	Entirety	Defendants	Stipulated Protective Order, ¶12.3
Exhibit 115	Entirety	Defendants	Stipulated Protective Order, ¶12.3
Exhibit 116	Entirety	Defendants	Stipulated Protective Order, ¶12.3
Exhibit 117	Entirety	Defendants	Stipulated Protective Order, ¶12.3
Exhibit 118	Entirety	Defendants	Stipulated Protective Order, ¶12.3
Exhibit 119	Entirety	Defendants	Stipulated Protective Order, ¶12.3
Exhibit 120	Entirety	Defendants	Stipulated Protective Order, ¶12.3
Exhibit 121	Entirety	Defendants	Stipulated Protective Order, ¶12.3
Exhibit 146	Entirety	Defendants	Stipulated Protective Order, ¶12.3
Exhibit 147	Entirety	Defendants	Stipulated Protective Order, ¶12.3
Exhibit 150	Entirety	Defendants	Stipulated Protective Order, ¶12.3
Exhibit 151	Entirety	Defendants	Stipulated Protective Order, ¶12.3
Exhibit 155	Entirety	Defendants	Stipulated Protective Order, ¶12.3
Exhibit 157	Entirety	Defendants	Stipulated Protective Order, ¶12.3
Exhibit 158	Entirety	Defendants	Stipulated Protective Order, ¶12.3
Exhibit 165	Entirety	Defendants	Stipulated Protective Order, ¶12.3

Exhibit 175	Entirety	Defendants	Stipulated Protective Order, ¶12.3
Exhibit 179	Entirety	Defendants	Stipulated Protective Order, ¶12.3
Exhibit 194	Entirety	Defendants	Stipulated Protective Order, ¶12.3
Exhibit 201	Entirety	Defendants	Stipulated Protective Order, ¶12.3
Exhibit 301	Entirety	Defendants	Stipulated Protective Order, ¶12.3
Deepak Ahuja Deposition (excerpts)	Entirety	Defendants	Stipulated Protective Order, ¶12.3
Deepak Ahuja SEC Transcript (excerpts)	Entirety	Defendants	Stipulated Protective Order, ¶12.3
Robyn Denholm Deposition (excerpts)	Entirety	Defendants	Stipulated Protective Order, ¶12.3
Egon-Pierre Durban Deposition (excerpts)	Entirety	Defendants	Stipulated Protective Order, ¶12.3
Egon-Pierre Durban SEC Transcript (excerpts)	Entirety	Defendants	Stipulated Protective Order, ¶12.3
Nii Owuraka Koney Deposition (excerpts)	Entirety	Defendants	Stipulated Protective Order, ¶12.3
Elon Musk Deposition (excerpts)	Entirety	Defendants	Stipulated Protective Order, ¶12.3
Elon Musk SEC Transcript (excerpts)	Entirety	Defendants	Stipulated Protective Order, ¶12.3
Sam Teller Deposition (excerpts)	Entirety	Defendants	Stipulated Protective Order, ¶12.3
Martin Viecha Deposition (excerpts)	Entirety	Defendants	Stipulated Protective Order, ¶12.3

Dated: January 11, 2022

Respectfully submitted,

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